

Carl D. Crowell, OSB No. 982049
email: carl@crowell-law.com
CROWELL LAW
P.O. Box 923
Salem, OR 97308
(503) 581-1240
Of attorneys for plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Case No.: 6:15-cv-00495-ST

KILLER JOE NEVADA, LLC,

Plaintiff,

v.

DOE-24.20.134.179,

Defendant.

PLAINTIFF'S MOTION FOR EXTENSION
OF DISCOVERY AND PTO DEADLINES

UNOPPOSED

LR 7-1 Conferral

The parties have conferred with respect to this motion and this motion is filed unopposed.

PLAINTIFF'S MOTION FOR EXTENSION OF DISCOVERY

AND PTO DEADLINES

The initial Discovery and Pretrial Scheduling Order in this matter was entered March 26, 2015. Dkt. 4. Leave for plaintiff to ascertain the identity of the subscriber from the ISP was granted on March 29, 2015. Dkt. 6. After a third party subpoena to the relevant ISP a First Amended Complaint was filed on May 26, 2015. Dkt. 12.

The parties, all with counsel of record, had their initial conferral on July 16 and are now proceeding with discovery. As such, plaintiff requests the court reset all dates to run from July 16, 2015, such that:

Within 120 days of 07/16/2015, or by 11/16/2015 all parties shall:

- i. File all pleadings pursuant to Fed. R. Civ. P. 7(a) and 15;
- ii. Join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 and 19;
- iii. File all pretrial, discovery, and dispositive motions;
- iv. Complete all discovery;
- v. Confer as to Alternate Dispute Resolution pursuant to LR 16-4(c); and
- vi. Submit a schedule for expert discovery.

And, within 150 days of 07/16/2015, or by 12/14/2015 all parties shall:

- i. File a Joint ADR Report pursuant to LR 16-4(d); and
- ii. File a Proposed Pretrial Order pursuant to LR 16-5.

DATED: July 17, 2014.

Respectfully submitted,

CROWELL LAW

/s/ Carl D. Crowell

Carl D. Crowell, OSB No. 982049

email: crowell@kite.com

P.O. Box 923

Salem, OR 97308

(503) 581-1240

Of counsel for plaintiff